

# **Exhibit A**

1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF GEORGIA  
4 ATLANTA DIVISION

5 ROADSINC, INC., )  
6 Plaintiff, )  
7 vs. ) CASE NO.  
8 RELAY PAYMENTS, INC., ) 1:21-CV-03420-MLB  
9 SPENCER BARKOFF, )  
10 JAMES RYAN DROEGE, )  
11 and DOES 1 -10, )  
Defendants. )  
\_\_\_\_\_)

12  
13  
14 VIDEOTAPED DEPOSITION OF  
15 JAMES RYAN DROEGE  
16 APPEARING REMOTELY FROM  
17 ATLANTA, GEORGIA

18  
19 MONDAY, NOVEMBER 15, 2021  
20  
21

22 Reported by:  
23 Judith Leitz Moran, CCR, RPR, RSA  
24 JOB NO.: 202689  
25 APPEARING REMOTELY FROM ATLANTA, GEORGIA

1 JAMES RYAN DROEGE

2 being terminated, correct?

3 MR. FOX: Yes.

4 A So can you ask the question one more time  
5 just to make sure I answer it clearly?

6 BY MR. FOX:

7 Q In or about 2018, before you were  
8 terminated, did you take any steps in anticipation  
9 of a potential departure from RoadSync?

10 A Yes.

11 Q What such steps did you take?

12 A Given the circumstances that were going  
13 on at the company at that time, I felt it  
14 imperative to maintain a copy of my email for a  
15 variety of different reasons, and so I made sure  
16 that I had a copy of that pending anything else  
17 that could take place.

18 Q And how did you make sure that you  
19 maintained a copy of your email?

20 A There's a feature in Google that allows  
21 you to archive email boxes.

22 Q And to where did you archive the Google  
23 email box?

24 A On to my computer.

25 Q That is the laptop computer?